

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

MARIA DEL CARMEN HERNANDEZ)	
PICART, ET AL,)	
)	
PLAINTIFFS,)	CIVIL NO. 98-1354 (DRD)
)	
v.)	
)	
WILLIAM ROLON COLON, ET AL,)	
DEFENDANTS.)	
)	

URGENT MOTION FOR DISBURSEMENT

OF REGISTRY FUNDS

TO THE HONORABLE COURT:

COMES NOW Plaintiff, PHILLIPE ISAAC SANCHEZ HERNANDEZ, through the undersigned legal representation, and very respectfully states, alleges and requests:

On December 6, 1999, via Motion Submitting Checks (Docket Number 21), the principal sum of \$76,789.20 was deposited for the benefit of herein appearing plaintiff Phillippe Isaac Sánchez Hernández via check number 569486 issued by the Banco Bilbao Vizcaya. On October 14th, 2005, María del Carmen Hernández Picart, mother of Phillippe, subscribed a sworn statement before Florida Notary Public Jesus Gonzalez, granting her son, Phillippe Isaac Sanchez Hernández, emancipation under Article 233 of the Civil Code of Puerto Rico (31 LPRA § 911).

Phillipe Isaac has sustained severe second and third degree burns to his face and ears and is under treatment for same. Attached herewith are statements by Dr. Jose C.

Alvarez attesting to the condition and treatment modalities being undertaken (Exhibits 1 & 2). Attached also is a photo of Phillip Isaac showing the extent of his lesions (Exhibit 3). Additionally, the following documents are herein attached:

- 1) Affidavit (Exhibit 4 & 5), and,
- 2) Certification/Apostille by the Secretary of State for the State of Florida certifying Jesus Gonzalez as duly commissioned (Exhibit 6).

The documents submitted herein fulfill the legal requirements for the emancipation of herein appearing plaintiff in accordance with Article 233 and the guidelines issued in Vda. De Ruiz v. Registrador, 93 DPR 914 (1967). The undersigned is in possession of the original documents which will be submitted to the Demographic Register for its inscription, however, we note that said inscription does not limit Philippe's rights to seek the disbursement herein requested (see last sentence of Article 233).

The foregoing is submitted in order to request urgent disbursement of the funds belonging to Phillip Isaac Sanchez Hernandez. The principal amount deposited in 1999 was the sum of \$76,789.20. Disbursement should be as follows:

- 1) The amount of \$1,500.00, in the nature of attorney's fees, to the order of Javier A. Morales Ramos, P.O. Box 362677, San Juan, Puerto Rico, 00936-2677; and,
- 2) The remainder (\$76,789.20 - \$1,500.00), that is \$75,289.20, plus any accrued interest to the original principal amount, minus any statutory user's

fees, to the order of Phillippe Isacc Sánchez Hernández, 2915 Plunkett Street, Apt 1, Hollywood, Florida 33020.

WHEREFORE, it is requested that expedited disbursement of funds be ordered as requested.

RESPECTFULLY SUBMITTED.

This is an ex-parte motion that does not require notification to any other party.

In San Juan, Puerto Rico, this 28th day of November, 2005.

ss/ Javier A. Morales Ramos
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